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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JPMORGAN CHASE BANK, N.A.,  
Plaintiff,

vs.

G2 VENTURES LLC, a Nevada limited  
liability company; ARBUCKLE DRIVE  
HOMEOWNERS ASSOCIATION, INC., a  
Nevada non-profit corporation; PATRICIA  
K. PURCELL; and LEONARD D.  
PURCELL,

Defendants.

Case No. 2:17-cv-01576-RFB-NJK

**STIPULATION AND ORDER TO STAY  
ENTIRE CASE PENDING  
SETTLEMENT**

**(First Request)**

Pursuant to Local Rules LR IA 6-2 and LR 7-1, Plaintiff JPMorgan Chase Bank, N.A. (“Chase”), Defendant G2 Ventures LLC (“G2”), and Defendant Arbuckle Drive Homeowners Association (“Arbuckle”) (collectively, the “Parties”), through their respective attorneys, stipulate as follows:

1. On or about January 12, 2018, the Court entered an order extending the discovery deadlines, setting the deadline to complete discovery for February 27, 2018, dispositive motions for March 28, 2018, and the deadline to file the joint pre-trial order for April 26, 2018 (ECF No. 57).

2. The Parties are in the process of finalizing settlement.

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3. Given the anticipated resolution and to avoid wasting resources and incurring potentially unnecessary expense associated with dispositive motions and continued litigation, the Parties agree, and hereby request, a stay of the case to give each side sufficient time and resources to finalize settlement.

4. The Parties anticipate that it may take approximately 90 days to finalize settlement and the settlement agreement, perform the material terms under the settlement agreement, and be in a position to dismiss this matter.

5. The Parties make this stipulation in good faith and not for purposes of delay.

Dated: March 22, 2018.

BALLARD SPAHR LLP

PENGILLY LAW FIRM

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*Attorneys for Defendant G2 Ventures LLC*

IT IS SO ORDERED:



RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED: March 23, 2018